

January 29, 2007

MEMORANDUM FOR : Reviewer of 1220-0045

FROM : William McCarthy, Chief
Division of Safety and Health Statistics
Office of Compensation and Working Conditions
Bureau of Labor Statistics

SUBJECT : Survey of Occupational Injuries and Illnesses
Quality Assurance Study

Attached is a description of a proposed quality assurance study of the Survey of Occupational Injuries and Illnesses (SOII) to be conducted for survey year 2006, which began January 1, 2007. The 2006 SOII is relying increasingly on electronic means of data collection, including the internet. BLS has developed this proposed follow-back study to ensure that, in this new data collection environment, the survey correctly captures the data that employers have recorded on their OSHA logs.

This follow-back study is described in the attachment. BLS plans to conduct this study from date of approval to July 16, 2007, when the current 2006 SOII data collection activities end.

OMB approval for SOII is not scheduled to expire until August 31, 2007.

If you have any questions about this request, please contact William McCarthy by telephone at 202-691-6163 or by e-mail at McCarthy_W@bls.gov.

Note to Reviewer of 1220-0045

I. Introduction and Purpose

The Bureau of Labor Statistics (BLS) conducts the Survey of Occupational Injuries and Illnesses (SOII) in conjunction with participating State statistical agencies. The SOII is an annual, mandatory survey of work-related injuries and illnesses experienced by establishments in the United States. The survey captures data from Occupational Safety and Health Administration (OSHA) logs of workplace injuries and illnesses maintained by employers. Traditionally, these data have been obtained from survey respondents by means of a hardcopy survey form.

Over the past several years, BLS has been experimenting with various means of electronic data collection for the SOII, principally relying on the internet. The goal is to transition largely to electronic data collection in future survey years. But, before placing principal reliance on electronic data collection, it is important to ensure that the quality of data captured electronically matches that of data collected with the traditional hard copy survey forms.

BLS has developed its own follow-back study to ensure the various modes of data collection in the survey correctly capture the data that employers have recorded on their OSHA logs. The objective of the follow-back study is to determine if employers are accurately transcribing data from the OSHA 300 log to the OSHA 300A summary to the BLS9300 Data Collection Form, whether electronic or hard copy. The establishments in this study will be respondents to the 2006 SOII. The sample will be approximately 3,500 establishments.

The general procedure for this follow-back study is as follows:

- The sample size of 3,500 was determined by taking into account both what is needed for statistically reliable estimates and the workload capacity of the BLS OSH program office. The BLS OSH program office will contact the employers and tabulate the results of the study. The sample size will allow BLS to determine the effect, if any, of the different types of BLS data collection – the Internet Data Collection Facility, the e-mail option, and the hard copy BLS9300 form – on the employer's ability to correctly transcribe data with a power rating of over 99%. The sample size will also allow effects of the five different employment size classes with a power rating of over 99%. BLS will also attempt to analyze effects by the North American Industry Classification System (NAICS) sector level industries. A response rate of 100% would yield a power rating of approximately 83%. A response rate of 75% would yield a power rating of approximately 65%. Because of the sample size and response rate needed to support an 80% power rating versus the work force available for this survey, analysis by NAICS sector is of secondary importance.
- The size of the effect being targeted is one-half of the sigma (standard deviation of the specified variable for analysis) in the power computation. Based on an expected transform sigma of 4 (magnitudes of the transform range from 4 to 9 over a range of error transcription rates from 1 percent to 10 percent, and industry standard error rate is near 3 percent), this maps back to a detectable effect of approximately 2 percent difference in transcription error rates between groups at the specified power levels. Given the consistency of the transcription error rates in the literature for health data in a tighter band than the range specified here, we believe this assumption regarding the expected sigma is a conservative one.
- BLS will sample employers who respond in a designated timeframe within each month to determine any effect of when an employer responds. For example, the sample might take one out of every five employers who respond during the second week of each month (March through July). BLS is still analyzing the appropriate time period.
- BLS will also sample the employers who responded prior to the beginning of the study to determine the effect of when employers respond.
- The national office will contact these employers either by phone or by letter and request that the employer send a copy of their OSHA 300 log and OSHA 300A summary. The employer can e-mail a scanned copy, fax a copy, or mail it to BLS. A copy of the proposed letter is attached.
- BLS will use the OSHA 300 log to determine if the employer transcribed their injury/illness numbers correctly to their OSHA 300A summary and then to the BLS data collection instrument.

- Results will be tabulated by the different data collection instruments that the employer may use; by employment size classes; and by when an employer responds. BLS will also attempt to analyze results by NAICS sector level industries. BLS will tabulate discrepancies and the magnitudes of the differences.

II. Burden Hours

Additional burden hours of 3,500 are requested. Employers will need to send in a copy of their OSHA 300 log and OSHA 300A summary forms. Since these forms needed to be available to submit the BLS9300, the burden hours needed consist of making a copy and then either mailing them to BLS, faxing them to BLS, or scanning and e-mailing them to BLS. We estimate 10 minutes per establishment for a total of 583 hours for the study.

III. Payments to Respondents

The SOII does not provide any payments to the respondents.